

Message

From: Bertram, Emily [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=463C65AD3E0C415BB1612500C957D6E8-LINN, EMILY]
Sent: 4/29/2020 5:33:21 PM
To: Wejkszner, Mark [mwejkszner@pa.gov]; Kempa, Raymond [rkempa@pa.gov]; Frederick, Norman [nfrederick@pa.gov]
CC: Supplee, Gwendolyn [Supplee.Gwendolyn@epa.gov]; aschweitze [aschweitze@pa.gov]
Subject: RE: [External] RE: Copy of RFD Submitted for B Braun Medical

Mark,

Thank you very much for this additional information. It is very helpful! We will follow up if we need anything else. I believe EPA headquarters has an initiative going on right now that is looking at EtO, hence the questions.

Take care,
Emily

Emily Bertram
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From: Wejkszner, Mark <mwejkszner@pa.gov>
Sent: Wednesday, April 29, 2020 11:52 AM
To: Bertram, Emily <Bertram.Emily@epa.gov>; Kempa, Raymond <rkempa@pa.gov>; Frederick, Norman <nfrederick@pa.gov>
Cc: Supplee, Gwendolyn <Supplee.Gwendolyn@epa.gov>; aschweitze <aschweitze@pa.gov>
Subject: RE: [External] RE: Copy of RFD Submitted for B Braun Medical

Emily/Gwendolyn, the dry bed scrubber is installed and operating. They received a plan approval for a new system including a new oxidizer. Last I heard they were installing the new system (RTO) but with COVID-19 construction had to be stopped. I heard they were requesting a waiver from the Governor but I can't confirm if construction has been completed. I can't get access to the RFD but Ray or Norm should be able to.

Below is a writeup of what has been implemented at B. Braun.

On January 31st, 2020, the Department issued a Plan Approval to B. Braun Medical Inc. to construct and operate enhanced emissions control equipment to further reduce emissions associated with B. Braun's medical instrument apparatus sterilization operations. The Plan Approval allows B. Braun to replace the existing Wet Scrubber Deoxx Unit and Catalytic Oxidizer with the Anguil System which consists of a peak shaver and catalytic oxidizer. Based on information provided by Anguil, the Anguil System is expected to achieve 99.9% emissions reduction or, for a lower concentration inlet stream, an exhaust concentration below 1 part per million by volume (ppmv). B. Braun will determine the specific emissions control efficiency via stack testing upon installation. In addition, B. Braun has installed a Dry Bed Unit control device for EtO emissions from the sterilization unit back vents. The Dry Bed Unit is an additional voluntary EtO control device that may further reduce actual EtO emissions. The Dry Bed Unit is expected to achieve greater than 99% emissions reduction

which will be confirmed through future stack testing. The Department provided EPA with B. Braun's 2014 facility emissions data for their National Air Toxics Assessment (NATA) modeling project which resulted in the facility's estimated excess lifetime cancer risks exceeding the EPA level of concern of 100 in a million. Because of this study, B. Braun initiated this enhanced control initiative and the Department worked with B. Braun to expedite the review and issuance of the plan approval.

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From: Bertram, Emily <Bertram.Emily@epa.gov>
Sent: Wednesday, April 29, 2020 11:07 AM
To: Kempa, Raymond <rkempa@pa.gov>; Frederick, Norman <nfrederick@pa.gov>
Cc: Wejkszner, Mark <mwejkszner@pa.gov>; Supplee, Gwendolyn <Supplee.Gwendolyn@epa.gov>
Subject: [External] RE: Copy of RFD Submitted for B Braun Medical

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Additionally, I believe there may have been talk of B Braun installing a new scrubber via a Plan Approval action- do you know a status on that?

Thanks again!

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To: rkempa@pa.gov; nfrederick@pa.gov
Cc: mwejkszner@pa.gov; Supplee, Gwendolyn <Supplee.Gwendolyn@epa.gov>
Subject: RE: Copy of RFD Submitted for B Braun Medical

Good morning Ray and Norm,

Would either of you know if the control device referenced below has been installed and is it in operation at B. Braun?

Thanks!
Emily

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From: Supplee, Gwendolyn <Supplee.Gwendolyn@epa.gov>
Sent: Thursday, January 30, 2020 1:25 PM
To: rkempa@pa.gov; nfrederick@pa.gov
Cc: Bertram, Emily <Bertram.Emily@epa.gov>
Subject: Copy of RFD Submitted for B Braun Medical

Hi Ray and Norman –

EPA is looking for a copy of an RFD submitted by B Braun Medical for its' facility located in Allentown, PA. The one we are looking for is Request for Determination No. 7956 for the dry bed scrubber. As we continue to track facilities that use Ethylene Oxide, this is of interest to our Monitoring Group because it involves the installation of a control device. Would it be possible for you to email me a copy of the RFD?

If you have any further, questions, please let me know.
Thanks, Gwen

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